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THE HONORABLE MARY K. DIMKE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

MARISSA REYES, LEAGUE OF  
UNITED LATIN AMERICAN CITIZENS,  
LATINO COMMUNITY FUND,

Plaintiffs,

v.

BRENDA CHILTON, in her official  
capacity as Benton County Auditor and  
Canvassing Review Board member, ANDY  
MILLER, in his official capacity as Benton  
County Canvassing Review Board member,  
XAN AUGEROT, in his official capacity as  
Benton County Canvassing Review Board  
member, CHARLES ROSS, in his official  
capacity as Yakima County Auditor and  
Canvassing Review Board Member,  
JOSEPH BRUSIC, in his official capacity  
as Yakima County Canvassing Review  
Board member, RON ANDERSON in his  
official capacity as Yakima County  
Canvassing Review Board member, SKIP  
MOORE, in his official capacity as Chelan  
County Auditor and Canvassing Review  
Board member, DOUGLAS SHAE, in his  
official capacity as Chelan County  
Canvassing Review Board member, BOB  
BUGERT in his official capacity as Chelan  
County Canvassing Review Board member,

Defendants.

No. 4:21-cv-05075-MKD

**DECLARATION OF  
CALLIE A. CASTILLO**

*[Filed Concurrently with  
Defendants' Motion for  
Summary Judgment]*

1 I, Callie Castillo, declare as follows:

2 1. I am an attorney with Lane Powell PC, representing the defendants. I  
3 have personal knowledge of the facts set forth herein.

4 2. Attached as **Exhibit A** is a copy of an excerpt from the 1905  
5 Washington Session Laws.

6 3. Attached as **Exhibit B** is a copy of excerpts from the 2010 version of  
7 the Revised Code of Washington.

8 4. Attached as **Exhibit C** is a copy of an excerpt from the 1915  
9 Washington Session Laws.

10 5. Attached as **Exhibit D** is a copy of an excerpt from the 1921  
11 Washington Session Laws.

12 6. Attached as **Exhibit E** is a copy of an excerpt from the 1923  
13 Washington Session Laws.

14 7. Attached as **Exhibit F** is a copy of an excerpt from the 1933  
15 Washington Session Laws.

16 8. Attached as **Exhibit G** is a copy of an excerpt from the 1943  
17 Washington Session Laws.

18 9. Attached as **Exhibit H** is a copy of an excerpt from the 1950  
19 Washington Session Laws.

20 10. Attached as **Exhibit I** is a copy of an excerpt from the 1955 Washington  
21 Session Laws.

22 11. Attached as **Exhibit J** is a copy of an excerpt from the 1963  
23 Washington Session Laws.

24 12. Attached as **Exhibit K** is a copy of an excerpt from the 1965  
25 Washington Session Laws.

26 13. Attached as **Exhibit L** is a copy of an excerpt from the 1967  
27 Washington Session Laws.

1           14. Attached as **Exhibit M** is a copy of an excerpt from the 1977  
2 Washington Session Laws.

3           15. Attached as **Exhibit N** is a copy of an excerpt from the 1983  
4 Washington Session Laws.

5           16. Attached as **Exhibit O** is a copy of an excerpt from the 1963 version of  
6 the Pennsylvania Annotated Statutes.

7           17. Attached as **Exhibit P** is a copy of an excerpt from the 1981 version of  
8 the Florida Annotated Statutes.

9           18. Attached as **Exhibit Q** is a copy of an excerpt from the 1977 version of  
10 the Illinois Revised Statutes.

11           19. Attached as **Exhibit R** is a copy of an excerpt from the 2005  
12 Washington Session Laws.

13           20. Attached as **Exhibit S** is a copy of an excerpt from the 2006 version of  
14 the Revised Code of Washington.

15           21. Attached as **Exhibit T** is a copy of an excerpt from the 2011  
16 Washington Session Laws.

17           22. Attached as **Exhibit U** is a copy of an excerpt from the Washington  
18 State Register containing entry 06-02-028.

19           23. Attached as **Exhibit V** is a copy of an excerpt of the Washington State  
20 Register containing entry 05-12-116.

21           24. Attached as **Exhibit W** to this declaration is a copy of Exhibit 7 to the  
22 deposition of Matt Barreto.

23           25. Attached as **Exhibit X** is a copy of excerpts from the transcript of the  
24 deposition under Rule 30(b)(6) of Benton County designee Brenda Chilton.

25           26. Attached as **Exhibit Y** is a copy of excerpts from the transcript of the  
26 deposition under Rule 30(b)(6) of Yakima County designee Kathy Fisher.

27           27. Attached as **Exhibit Z** is a copy of excerpts from the transcript of the

1 deposition of Chelan County designee Skip Moore.

2 28. Attached as **Exhibit AA** is a copy of excerpts from the transcript of the  
3 deposition of Kevin Overbay.

4 29. Attached as **Exhibit BB** is a copy of excerpts from the transcript of the  
5 deposition of Shon Small.

6 30. Attached as **Exhibit CC** is a copy of excerpts from the transcript of the  
7 deposition of Jerome Delvin.

8 31. Attached as **Exhibit DD** is a copy of excerpts from the transcript of the  
9 deposition of Ron Anderson.

10 32. Attached as **Exhibit EE** is a copy of excerpts from the transcript of the  
11 deposition of Daniel Reynoso.

12 33. Attached as **Exhibit FF** is a copy of Exhibit 4 to Mr. Reynoso's  
13 deposition. The public version of this declaration contains a slip sheet. The version  
14 of this declaration requested to filed under seal contains the exhibit.

15 34. Attached as **Exhibit GG** is a copy of Exhibit 6 to Mr. Reynoso's  
16 deposition. The public version of this declaration contains a slip sheet. The version  
17 of this declaration requested to filed under seal contains the exhibit.

18 35. Attached as **Exhibit HH** is a copy of excerpts from the transcript of the  
19 deposition of Jesse Reyes.

20 36. Attached as **Exhibit II** is a copy of Exhibit 6 to Mr. Reyes's deposition.

21 37. Attached as **Exhibit JJ** is a copy of excerpts from the transcript of the  
22 deposition under Rule 30(b)(6) of Washington State Auditor's Office designee Lisa  
23 Weber.

24 38. Attached as **Exhibit KK** is a copy of Exhibit 1 to Dr. Weber's  
25 deposition.

26 39. Attached as **Exhibit LL** is a copy of excerpts from the transcript of the  
27 deposition under Rule 30(b)(6) of Latino Community Fund designee Lillian

1 Ballesteros.

2 40. Attached as **Exhibit MM** is a copy of excerpts from the transcript of  
3 the deposition under Rule 30(b)(6) of League of United Latin American Citizens  
4 designee Gabriel Portugal.

5 41. Attached as **Exhibit NN** is a copy of excerpts from Plaintiff League of  
6 United Latin American Citizens' Amended and Supplemental Responses and  
7 Objections to Defendants' First Interrogatories, together with a later-provided  
8 signature page.

9 42. Attached as **Exhibit OO** is a copy of excerpts from Plaintiff Latino  
10 Community Fund's Amended and Supplemental Responses and Objections to  
11 Defendants' First Interrogatories, together with a later-provided signature page.

12 43. Attached as **Exhibit PP** is a copy of excerpts from Plaintiff Daniel  
13 Reynoso's Amended and Supplemental Responses and Objections to Defendants'  
14 First Interrogatories, together with a later-provided signature page.

15 44. Attached as **Exhibit QQ** is a copy of excerpts from Plaintiff Jesse  
16 Reyes's Amended and Supplemental Responses and Objections to Defendants' First  
17 Interrogatories, together with a later-provided signature page.

18 45. Attached as Exhibit **RR** is a copy of Exhibit 8 to the deposition of Dr.  
19 Barreto.

20 I declare under penalty of perjury under the laws of the United States of  
21 America that the foregoing is true and correct to the best of my knowledge.

22 Executed on June 9, 2023, at Seattle, Washington.

23  
24  
25 s/ Callie A. Castillo  
26 Callie A. Castillo  
27

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 9, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will automatically generate a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:  
None.

Executed this 9<sup>th</sup> day of June, 2023, at Seattle, Washington.

By s/Kathryn Savaria  
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